

HEATHER E. WILLIAMS, SBN 122664
Federal Defender
HOOTAN BAIGMOHAMMADI, SBN 279105
Assistant Federal Defender
Designated Counsel for Service
801 I Street, Third Floor
Sacramento, CA 95814
T: (916) 498-5700
F: (916) 498-5710

Attorneys for Defendant
Mr. Pereira

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:22-CR-00047-JAM
Plaintiff,)
vs.) **STIPULATION AND ORDER TO CONTINUE**
OLYMPUS SHAQUILLE) **STATUS HEARING AND EXCLUDE TIME**
PEREIRA,) Date: June 28, 2022
Defendant.) Time: 9:30 a.m.
) Judge: John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Alstyn Bennett, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Olyimpus Shaquelle Pereira, that the previously scheduled Status Hearing set for June 28, 2022 be continued to September 13, 2022 at 9:30 a.m.

The parties specifically stipulate as follows:

1. By previous order, the Status Hearing is currently scheduled for June 28, 2022 at 9:30 a.m. Time has been ordered excluded through that date.
 2. Mr. Pereira respectfully requests that the Court continue the Status Hearing to September 13, 2022 at 9:30 a.m.
 3. The government has produced 182 pages and various audio/video recordings in discovery. Mr. Pereira requires additional time to review the discovery;

1 investigate and research possible defenses; research potential pretrial motions;
2 explore potential resolutions to the case; and otherwise prepare for trial.

3 4. Mr. Pereira believes that failure to grant his motion would deny him the
4 reasonable time necessary for effective preparation, taking into account the
5 exercise of due diligence.

6 5. The government does not object to Mr. Pereira's motion.

7 6. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
8 Act), the parties request that the time period between June 28, 2022 and
9 September 13, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. §
10 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
11 granted by the Court at the defense's request, based on a finding that the ends of
12 justice served by granting the continuance outweighs the best interest of the
13 public and Mr. Pereira in a speedy trial.

14
15 Respectfully submitted,

16 HEATHER E. WILLIAMS
17 Federal Defender

18 Date: June 10, 2022

19 /s/ Hootan Baigmohammadi
20 HOOTAN BAIGMOHAMMADI
21 Assistant Federal Defender
22 Attorneys for Defendant
23 Mr. Pereira

24 Date: June 10, 2022

25 PHILLIP A. TALBERT
26 United States Attorney

27 /s/ Alstyn Bennett
28 ALSTYN BENNETT
29 Assistant United States Attorney
30 Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Date: June 10, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE